UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Bankr. No. 24-20004 CMB
ROBERT U. HANDLOW, JR.,	)
	) Chapter 13
Debtor.	)
	) Docket No. 58
WELLS FARGO BANK,	) Related to Docket No.
	)
Movant,	) Hearing Date & Time:
	)
vs.	) Claim No. 1
	)
ROBERT U. HANDLOW, JR.	)
AND RONDA J. WINNECOUR,	)
CHAPTER 13 TRUSTEE,	)
	)
Respondents.	)

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtor, Robert U. Handlow, Jr. by and through his attorney, who respectfully represents the following:

1. On or about January 2, 2024, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.

2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.

3. Wells Fargo Bank filed a Notice of Mortgage Payment Change

(a) The monthly mortgage payment of **$1,169.94** is being **decrease**d **$1,143.31** effective **3/1/2025.**

4. The Chapter 13 Plan is sufficient to fund the mortgage payment change.
WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.   Respectfully submitted.

Date: 10/24/2024   /s/ Rodney D. Shepherd
                                    Rodney D. Shepherd, Esquire
                                    Attorney for the Debtors
                                    PA I.D. No. 56914
                                    2403 Sidney Street, Suite 208
                                    Pittsburgh, PA 15203
                                    (412) 471-9670
                                    rodsheph@cs.com

CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 4th day of March, 2025, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

Wells Fargo Bank
Attn: Brent Lemon, Esquire
blemon@kmllawgroup.com

By: /s/ Rodney D. Shepherd
    Rodney D. Shepherd
    Attorney for the Debtor
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